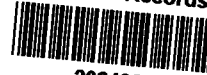


Holme Roberts & Owen LLP

EPA Region 5 Records Ctr.



202438

April 24, 2003



Via Certified Mail, Return Receipt Requested

Ms. Eileen Furey, Esq. (C-14J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

Re: March 4, 2003 Request for Information Pursuant to Section 104(e) of CERCLA
for Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo
and Allegan Counties, Michigan
Issued to Graphic Packaging Corporation

Matthew J. Lepore
(303) 866-0343
leporem@hro.com

Dear Ms. Furey:

On March 10, 2003, Graphic Packaging Corporation ("Graphic") received a Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), (the "104(e) Request") regarding the referenced Superfund site ("Kalamazoo Superfund Site"). GPC is the current owner of a Recycle Paperboard Mill located at 1500 N. Pitcher Street, Kalamazoo, MI (the "Mill"). Information regarding certain operations of the Mill during the period between 1954 and 1989 appear to be within the scope of the 104(e) Request.

GPC acquired the Mill from Fort James Corporation in an Asset Purchase transaction in April 1999. Fort James Corporation indemnified Graphic for liabilities related to the Kalamazoo Superfund Site under the terms of the April 1999 Asset Purchase Agreement. It is my understanding that Fort James Corporation was subsequently acquired by Georgia Pacific Corporation ("GP").

Based on our telephone conversation of April 23, 2003, I understand that GP is providing a certain summary of information related to the Mill's operations during the relevant time period as a preliminary response to the 104(e) Request. I understand that United States Environmental Protection Agency ("EPA") may require GP to provide an additional response to the 104(e) Request in the future.

During our telephone call on April 23, 2003, you agreed on behalf of EPA that EPA would accept the summary of information that GP is providing in lieu of a response to the 104(e) Request from Graphic at this time. Graphic's responses to the 104(e) Request would otherwise be due on May 9, 2003. Based on our agreement, Graphic has

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April 24, 2003

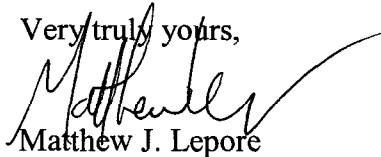
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no current obligation to provide a response to the 104(e) Request on or before May 9, 2003, and no obligation to do so until further written notice from EPA.

In the event EPA requires any additional response to the 104(e) from GP, Graphic and GP will coordinate to ensure that documents or information responsive to the additional information requests, if any, that are in Graphic's possession are provided to EPA, either by Graphic or by GP, pursuant to the requirements of 42 U.S.C. § 9604.

Please notify me in writing as soon as possible if any part of the foregoing is not an accurate representation of the agreement we reached on April 23, 2003 or of Graphic's current obligations pursuant to the 104(e) Request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Matthew J. Lepore", with a long, sweeping horizontal stroke extending to the right.

Matthew J. Lepore

cc: Darden Coors
Spencer Maurer